

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

No. 18-cv-01776-JRT-HB

In Re Pork Antitrust Litigation

This Document Relates to:

Consumer Indirect Plaintiffs

**SEABAORD FOODS LLC'S ANSWER AND DEFENSES TO THE CONSUMER
INDIRECT PURCHASER PLAINTIFFS' SECOND AMENDED AND
CONSOLIDATED CLASS ACTION COMPLAINT**

Defendant Seaboard Foods LLC (“Seaboard”) hereby submits its answer and affirmative defenses to the Consumer Indirect Purchaser Plaintiffs’ Second Amended and Consolidated Class Action Complaint, ECF No. 392 (“Complaint”), as follows:

PRELIMINARY STATEMENT

Seaboard denies all allegations in the Complaint unless expressly admitted. Where an allegation in the Complaint is directed at another Defendant or a party that is not affiliated with Seaboard, except as otherwise expressly stated, Seaboard denies the allegations on the basis that it lacks the knowledge or information sufficient to form a belief concerning the truth of such allegations. Further, unless otherwise expressly admitted, Seaboard denies any allegations in the headings, footnotes, or in other places in the Complaint, to the extent any such allegations require a response. Any headings, subheadings, or similar text that Seaboard has reprinted in this Answer are for the

convenience of the Court and the parties, and are not intended to be nor shall they be construed as an admission of any fact by Seaboard.

ANSWER

Answer to Unnumbered Paragraph: The unnumbered paragraph contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required.

Answer to Paragraph 1: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 1 premised on any such conspiracy. Paragraph 1 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 1 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 2: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 2 premised on any such conspiracy. To the extent that the allegations in Paragraph 2 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining allegations in Paragraph 2.

Answer to Paragraph 3: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 3 premised on any such conspiracy. Paragraph 3 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required,

Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 3 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 4: To the extent Paragraph 4 characterizes information Agri Stats provided to Seaboard, Seaboard denies the allegations. Seaboard otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 and, therefore, denies the allegations.

Answer to Paragraph 5: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 5 premised on any such conspiracy. To the extent that the allegations in Paragraph 5 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in Paragraph 5 fully and accurately summarize those reports. Seaboard denies the remaining allegations in Paragraph 5.

Answer to Paragraph 6: Seaboard denies the allegations in paragraph 6.

Answer to Paragraph 7: Paragraph 7 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that the allegations in Paragraph 7 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the

allegations in Paragraph 7 fully and accurately summarize those reports. Seaboard denies the remaining allegations in Paragraph 7.

Answer to Paragraph 8: To the extent that the allegations in Paragraph 8 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining allegations in Paragraph 8.

Answer to Paragraph 9: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 9 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9 and, therefore, denies the allegations.

Answer to Paragraph 10: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 10 premised on any such conspiracy. Paragraph 10 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 10 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 11: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 11 premised on any such conspiracy. Paragraph 11 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that the allegations in Paragraph 11 relate to other Defendants and/or third parties to this action,

Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 12: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 12 premised on any such conspiracy. Paragraph 12 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that the allegations in Paragraph 12 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 13: Paragraph 13 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 13 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 14: Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 14 and, therefore, denies the allegations.

Answer to Paragraph 15: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 and, therefore, denies the allegations.

Answer to Paragraph 16: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 16 premised on any such conspiracy. Paragraph 16 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 16 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 17: Seaboard states that the reports referenced in Paragraph 17 speak for themselves, and denies any allegations inconsistent with their contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 17 and, therefore, denies the allegations.

Answer to Paragraph 18: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 and, therefore, denies the allegations.

Answer to Paragraph 19: Paragraph 19 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that the allegations in Paragraph 19 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to

form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 20: Seaboard states that the email and report referenced in Paragraph 20 speak for themselves, and denies any allegations inconsistent with their contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20 and, therefore, denies the allegations.

Answer to Paragraph 21: Seaboard states that the report referenced in Paragraph 21 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 22: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 22 premised on any such conspiracy. Seaboard states that the reports referenced in Paragraph 22 speak for themselves and denies any allegations inconsistent with their contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 22 and, therefore, denies the allegations.

Answer to Paragraph 23: Seaboard states that the report referenced in Paragraph 23 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 23 and, therefore, denies the allegations.

Answer to Paragraph 24: Seaboard states that the report referenced in Paragraph 24 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 24 and, therefore, denies the allegations.

Answer to Paragraph 25: Seaboard states that the report referenced in Paragraph 25 speaks for itself, and denies any allegations inconsistent with its contents. Paragraph 25 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 26: Seaboard states that the report referenced in Paragraph 26 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 26 and, therefore, denies the allegations.

Answer to Paragraph 27: Seaboard states that the report referenced in Paragraph 27 speaks for itself, and denies any allegations inconsistent with its contents. Paragraph 27 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 28: Seaboard states that the report referenced in Paragraph 28 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 29: Seaboard states that the report referenced in Paragraph 29 speaks for itself, and denies any allegations inconsistent with its contents. Paragraph 29 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 30: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 30 premised on any such conspiracy. Seaboard states that the report referenced in Paragraph 30 speaks for itself, and denies any allegations inconsistent with its contents. Paragraph 30 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 31: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 31 premised on any such conspiracy. Seaboard states that the presentation referenced in Paragraph 31 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 31 and, therefore, denies the allegations.

Answer to Paragraph 32: Paragraph 32 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 32 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 33: Seaboard states that the tool referenced in Paragraph 33 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 and, therefore, denies the allegations.

Answer to Paragraph 34: Seaboard states that the chart referenced in Paragraph 34 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 and, therefore, denies the allegations.

Answer to Paragraph 35: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 and, therefore, denies the allegations.

Answer to Paragraph 36: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 and, therefore, denies the allegations.

Answer to Paragraph 37: Seaboard states that the spreadsheet referenced in Paragraph 37 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37 and, therefore, denies the allegations.

Answer to Paragraph 38: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 and, therefore, denies the allegations.

Answer to Paragraph 39: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 and, therefore, denies the allegations.

Answer to Paragraph 40: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 and, therefore, denies the allegations.

Answer to Paragraph 41: Seaboard states that the chart referenced in Paragraph 41 speaks for itself, and denies any allegations inconsistent with its contents. Paragraph 41 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 41 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 and, therefore, denies the allegations.

Answer to Paragraph 42: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 42 premised on any such conspiracy. Seaboard states that the chart referenced in Paragraph 42 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 and, therefore, denies the allegations.

Answer to Paragraph 43: Seaboard states that the email and presentation referenced in Paragraph 43 speak for themselves, and denies any allegations inconsistent with their contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 43 and, therefore, denies the allegations.

Answer to Paragraph 44: Paragraph 44 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 44 contains factual assertions, Seaboard denies the allegations.

Answer to Paragraph 45: Seaboard admits that one type of Agri Stats report is an operations profit report. Seaboard states that the operations profit report speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 44 and, therefore, denies the allegations.

Answer to Paragraph 46: Seaboard states that the report referenced in Paragraph 46 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 47: Seaboard states that the report referenced in Paragraph 47 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 47 and, therefore, denies the allegations.

Answer to Paragraph 48: Seaboard states that the report referenced in Paragraph 48 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 49: Seaboard states that the report referenced in Paragraph 49 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 50: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 50 premised on any such conspiracy.

Paragraph 50 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 50 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 51: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 51 premised on any such conspiracy. Seaboard admits that one type of Agri Stats report is a swine processing report. Seaboard states that the reports referenced in Paragraph 51 speak for themselves, and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 51 and, therefore, denies the allegations.

Answer to Paragraph 52: Seaboard states that the report referenced in Paragraph 52 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 53: Seaboard states that the report referenced in Paragraph 53 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 54: Seaboard states that the report referenced in Paragraph 54 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 55: Seaboard states that the report referenced in Paragraph 55 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 56: Seaboard states that the slide referenced in Paragraph 56 speaks for itself, and denies any allegations inconsistent with its contents. Seaboard lacks

knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 56 and, therefore, denies the allegations.

Answer to Paragraph 57: Seaboard states that the report referenced in Paragraph 57 speaks for itself, and denies any allegations inconsistent with its contents.

Answer to Paragraph 58: Paragraph 58 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 58 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 59: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 59 premised on any such conspiracy. Paragraph 59 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 59 contains factual allegations, Seaboard admits that Agri Stats employees occasionally visited Seaboard for lawful purposes, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 59 and, therefore, denies the allegations.

Answer to Paragraph 60: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60 and, therefore, denies the allegations.

Answer to Paragraph 61: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 61 premised on any such conspiracy. Paragraph 61 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 61 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 62: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 62 premised on any such conspiracy. Paragraph 62 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 62 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 63: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 and, therefore, denies the allegations.

Answer to Paragraph 64: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 64 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 64 and, therefore, denies the allegations.

Answer to Paragraph 65: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 65 premised on any such conspiracy. Paragraph 65 contains Plaintiffs' characterization of their claims and/or legal argument and

conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 65 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 66: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 66 premised on any such conspiracy. Paragraph 66 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 66 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 67: Paragraph 67 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 67 and, therefore, denies the allegations.

Answer to Paragraph 68: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 68 premised on any such conspiracy. Paragraph 68 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 69: Paragraph 69 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and

conclusions. Seaboard admits that Agri Stats employees occasionally visited Seaboard for lawful purposes. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 69 and, therefore, denies the allegations.

Answer to Paragraph 70: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and, therefore, denies the allegations.

Answer to Paragraph 71: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and, therefore, denies the allegations.

Answer to Paragraph 72: Seaboard states that the document referenced in Paragraph 72 speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 72 and, therefore, denies the allegations.

Answer to Paragraph 73: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 73 premised on any such conspiracy. Paragraph 73 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent Paragraph 73 contains factual allegations, Seaboard admits that Agri Stats employees occasionally visited Seaboard for lawful purposes, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 73 and, therefore, denies the allegations.

Answer to Paragraph 74: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 74 premised on any such conspiracy. Seaboard states that the presentation referenced in Paragraph 74 speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 74 and, therefore, denies the allegations.

Answer to Paragraph 75: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 and, therefore, denies the allegations.

Answer to Paragraph 76: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 76 premised on any such conspiracy, including existence of an “agreement between competitors.” Paragraph 76 contains Plaintiffs’ characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent Paragraph 76 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and, therefore, denies the allegations.

Answer to Paragraph 77: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 and, therefore, denies the allegations.

Answer to Paragraph 78: Seaboard states that the presentation referenced in Paragraph 78 speaks for itself and denies any allegations inconsistent with its contents.

Answer to Paragraph 79: Seaboard states that the email referenced in Paragraph 79 speaks for itself and denies any allegations inconsistent with its contents.

Answer to Paragraph 80: Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in Paragraph 80 fully and accurately summarize those reports. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 80 and, therefore, denies the allegations.

Answer to Paragraph 81: Paragraph 81 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 81 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations, therefore, denies the allegations.

Answer to Paragraph 82: Seaboard states that the presentation referenced in Paragraph 82 speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 82 and, therefore, denies the allegations.

Answer to Paragraph 83: Seaboard denies the allegations in Paragraph 83.

Answer to Paragraph 84: Seaboard denies that it "could accurately identify the companies behind the metrics." Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 84 and, therefore, denies the allegations.

Answer to Paragraph 85: Seaboard states that the list referenced in Paragraph 85 speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 85 and, therefore, denies the allegations.

Answer to Paragraph 86: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 86 and, therefore, denies the allegations.

Answer to Paragraph 87: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 87 and, therefore, denies the allegations.

Answer to Paragraph 88: To the extent that the allegations in Paragraph 88 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in Paragraph 88 fully and accurately summarize those reports. Seaboard further states that each report speaks for itself and denies any allegations inconsistent with its contents.

Answer to Paragraph 89: To the extent that the allegations in Paragraph 89 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in Paragraph 89 fully and accurately summarize

those reports. Seaboard further states that the reports speak for themselves and denies any allegations inconsistent with their contents. Seaboard denies the remaining allegations in Paragraph 89.

Answer to Paragraph 90: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90 and, therefore, denies the allegations.

Answer to Paragraph 91: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 91 premised on any such conspiracy. Paragraph 91 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that the allegations in Paragraph 91 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 92: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92 and, therefore, denies the allegations.

Answer to Paragraph 93: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 and, therefore, denies the allegations.

Answer to Paragraph 94: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 and, therefore, denies the allegations.

Answer to Paragraph 95: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 and, therefore, denies the allegations.

Answer to Paragraph 96: Seaboard states that the district court opinion speaks for itself, and denies any characterization inconsistent with its contents. To the extent a response is required, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations.

Answer to Paragraph 97: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 97 premised on any such conspiracy. Paragraph 97 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 97 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 98: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 98 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 98 and, therefore, denies the allegations.

Answer to Paragraph 99: Seaboard denies that it “engaged in a parallel round of production cuts in 2009 through 2010,” had any “intentions to either stabilize or decrease supply,” made any statements about any such alleged intention, or gave any false reasons for any alleged “stabilization.” Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 99 and, therefore, denies the allegations.

Answer to Paragraph 100: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 and, therefore, denies the allegations.

Answer to Paragraph 101: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 and, therefore, denies the allegations.

Answer to Paragraph 102: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 and, therefore, denies the allegations.

Answer to Paragraph 103: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103 and, therefore, denies the allegations.

Answer to Paragraph 104: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 and, therefore, denies the allegations.

Answer to Paragraph 105: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and, therefore, denies the allegations.

Answer to Paragraph 106: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 and, therefore, denies the allegations.

Answer to Paragraph 107: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 and, therefore, denies the allegations.

Answer to Paragraph 108: Paragraph 108 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent Paragraph 108 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 and, therefore, denies the allegations.

Answer to Paragraph 109: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 and, therefore, denies the allegations.

Answer to Paragraph 110: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110 and, therefore, denies the allegations.

Answer to Paragraph 111: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 and, therefore, denies the allegations.

Answer to Paragraph 112: Seaboard admits that it has a marketing agreement with Triumph, states that the marketing agreement speaks for itself, and denies any allegations inconsistent with its terms. Paragraph 112 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent Paragraph 112 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 and, therefore, denies the allegations.

Answer to Paragraph 113: Seaboard states that the Tyson 10-K report speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 113 and, therefore, denies the allegations.

Answer to Paragraph 114: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114 and, therefore, denies the allegations.

Answer to Paragraph 115: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 and, therefore, denies the allegations.

Answer to Paragraph 116: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and, therefore, denies the allegations.

Answer to Paragraph 117: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and, therefore, denies the allegations.

Answer to Paragraph 118: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 and, therefore, denies the allegations.

Answer to Paragraph 119: Paragraph 119 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 119 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 and, therefore, denies the allegations.

Answer to Paragraph 120: Paragraph 120 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 120 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and, therefore, denies the allegations.

Answer to Paragraph 121: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and, therefore, denies the allegations.

Answer to Paragraph 122: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 and, therefore, denies the allegations.

Answer to Paragraph 123: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and, therefore, denies the allegations.

Answer to Paragraph 124: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 124 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations and, therefore, denies the allegations.

Answer to Paragraph 125: Paragraph 125 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 125 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and, therefore, denies the allegations.

Answer to Paragraph 126: Paragraph 126 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal

argument, and conclusions. To the extent Paragraph 126 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and, therefore, denies the allegations.

Answer to Paragraph 127: Paragraph 127 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 127 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 and, therefore, denies the allegations.

Answer to Paragraph 128: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128 and, therefore, denies the allegations.

Answer to Paragraph 129: Paragraph 129 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 129 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129 and, therefore, denies the allegations.

Answer to Paragraph 130: Paragraph 130 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 130 contains factual allegations,

Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130 and, therefore, denies the allegations.

Answer to Paragraph 131: Paragraph 131 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 131 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 131 and, therefore, denies the allegations.

Answer to Paragraph 132: Paragraph 132 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 132 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132 and, therefore, denies the allegations.

Answer to Paragraph 133: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133 and, therefore, denies the allegations.

Answer to Paragraph 134: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134 and, therefore, denies the allegations.

Answer to Paragraph 135: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135 and, therefore, denies the allegations.

Answer to Paragraph 136: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136 and, therefore, denies the allegations.

Answer to Paragraph 137: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 and, therefore, denies the allegations.

Answer to Paragraph 138: Seaboard denies the allegations in Paragraph 138.

Answer to Paragraph 139: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 139 premised on any such conspiracy. Paragraph 139 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 139 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 140: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 and, therefore, denies the allegations.

Answer to Paragraph 141: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141 and, therefore, denies the allegations.

Answer to Paragraph 142: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142 and, therefore, denies the allegations.

Answer to Paragraph 143: Seaboard denies that the allegations in Paragraph 143 fully and accurately describe “the path for pork raised for meat consumption from birth through sale to consumers.” Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 143 and, therefore, denies the allegations.

Answer to Paragraph 144: Paragraph 144 contains Plaintiffs’ characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterization, argument, and/or conclusions. To the extent Paragraph 144 contains factual allegations, Seaboard admits that it engages in hog production and pork processing, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 144 and, therefore, denies the allegations.

Answer to Paragraph 145: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 145 premised on any such conspiracy. To the extent that the allegations in Paragraph 145 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief

as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies the remaining allegations in Paragraph 145.

Answer to Paragraph 146: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 146 and, therefore, denies the allegations.

Answer to Paragraph 147: Seaboard admits that some pork packers also produce hogs. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 147 and, therefore, denies the allegations.

Answer to Paragraph 148: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 and, therefore, denies the allegations.

Answer to Paragraph 149: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149 and, therefore, denies the allegations.

Answer to Paragraph 150: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150 and, therefore, denies the allegations.

Answer to Paragraph 151: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151 and, therefore, denies the allegations.

Answer to Paragraph 152: Paragraph 152 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 152 and, therefore, denies the allegations.

Answer to Paragraph 153: Paragraph 153 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 153 and, therefore, denies the allegations.

Answer to Paragraph 154: Paragraph 154 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 154 and, therefore, denies the allegations.

Answer to Paragraph 155: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the Paragraph 155 and, therefore, denies the allegations.

Answer to Paragraph 156: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 156 premised on any such conspiracy. Paragraph 156 contains Plaintiffs' characterization of their claims and/or legal argument

and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 156 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 157: Seaboard denies the allegations in Paragraph 157.

Answer to Paragraph 158: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 and, therefore, denies the allegations.

Answer to Paragraph 159: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 and, therefore, denies the allegations.

Answer to Paragraph 160: Paragraph 160 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 160 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 and, therefore, denies the allegations.

Answer to Paragraph 161: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 and, therefore, denies the allegations.

Answer to Paragraph 162: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and, therefore, denies the allegations.

Answer to Paragraph 163: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 163 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 163 and, therefore, denies the allegations.

Answer to Paragraph 164: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164 and, therefore, denies the allegations.

Answer to Paragraph 165: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 165 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 165 and, therefore, denies the allegations.

Answer to Paragraph 166: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 166 premised on any such conspiracy. Paragraph 166 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 166 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 167: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 167 premised on any such conspiracy. Paragraph 167 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required,

Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 167 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 168: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 168 premised on any such conspiracy. Paragraph 168 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 168 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 169: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 169 premised on any such conspiracy. Paragraph 169 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 169 contains factual allegations, Seaboard admits that it sells pork, but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and, therefore, denies them.

Answer to Paragraph 170: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 170 premised on any such conspiracy. To the extent that the allegations in Paragraph 170 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in

Paragraph 170 fully and accurately summarize those reports. Seaboard denies the remaining allegations in Paragraph 170.

Answer to Paragraph 171: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171 and, therefore, denies the allegations.

Answer to Paragraph 172: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 172 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 and, therefore, denies the allegations.

Answer to Paragraph 173: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173 and, therefore, denies the allegations.

Answer to Paragraph 174: Seaboard states that its initial disclosures speak for themselves and denies any allegations inconsistent with their contents. To the extent that the allegations in Paragraph 174 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard admits that it receives Agri Stats reports for lawful purposes, but denies that the allegations in Paragraph 174 fully and accurately summarize those reports. Seaboard denies the remaining allegations in Paragraph 174.

Answer to Paragraph 175: Paragraph 175 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 175 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations.

Answer to Paragraph 176: Paragraph 176 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 176 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations.

Answer to Paragraph 177: Paragraph 177 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 177 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations.

Answer to Paragraph 178: Paragraph 178 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 178 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 179: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 179 premised on any such conspiracy. Paragraph 179 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 179 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 180: Paragraph 180 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 180 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 181: Paragraph 181 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 181 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 182: Paragraph 182 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that Paragraph 182 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 183: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 183 premised on any such conspiracy. Paragraph 183 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 and, therefore, denies the allegations.

Answer to Paragraph 184: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 and, therefore, denies the allegations.

Answer to Paragraph 185: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and, therefore, denies the allegations.

Answer to Paragraph 186: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 and, therefore, denies the allegations.

Answer to Paragraph 187: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and, therefore, denies the allegations.

Answer to Paragraph 188: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 and, therefore, denies the allegations.

Answer to Paragraph 189: Paragraph 189 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent Paragraph 189 contains factual allegations, Seaboard admits that pork loins, bacon, ribs, and other pork products are sold in supermarkets, among other places. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 189 and, therefore, denies the allegations.

Answer to Paragraph 190: Seaboard states that the presentation referenced in Paragraph 190 speaks for itself and denies any allegations inconsistent with its contents. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 190 and, therefore, denies the allegations.

Answer to Paragraph 191: Paragraph 191 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal

argument, and conclusions. To the extent that Paragraph 191 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 192: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and, therefore, denies the allegations.

Answer to Paragraph 193: Paragraph 193 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that the allegations in Paragraph 193 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 194: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 194 premised on any such conspiracy. Paragraph 194 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions. To the extent that the allegations in Paragraph 194 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies any remaining factual allegations.

Answer to Paragraph 195: Seaboard admits that this Court has subject-matter jurisdiction. Paragraph 195 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies Plaintiffs' characterizations, legal argument, and conclusions.

Answer to Paragraph 196: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 196 premised on any such conspiracy. Seaboard admits that venue is proper in this district for the purposes of this matter only. Seaboard denies the remaining allegations in Paragraph 196.

Answer to Paragraph 197: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 197 premised on any such conspiracy. Seaboard admits that it is subject to the personal jurisdiction of this Court for the purposes of this matter only. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning whether the other Defendants in this District are subject to the personal jurisdiction of this Court and, therefore, denies the allegations. Seaboard denies the remaining allegations in Paragraph 197.

Answer to Paragraph 198: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 198 premised on any such conspiracy. To the extent that the allegations in Paragraph 198 relate to other Defendants and/or third parties to this action, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of these allegations and, therefore, denies the allegations. Seaboard denies the remaining allegations in Paragraph 198.

Answer to Paragraph 199: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 199 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 199 and, therefore, denies the allegations.

Answer to Paragraph 200: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 200 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 200 and, therefore, denies the allegations.

Answer to Paragraph 201: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 201 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 201 and, therefore, denies the allegations.

Answer to Paragraph 202: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 202 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 202 and, therefore, denies the allegations.

Answer to Paragraph 203: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 203 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 203 and, therefore, denies the allegations.

Answer to Paragraph 204: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 204 premised on any such conspiracy.

Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 204 and, therefore, denies the allegations.

Answer to Paragraph 205: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 205 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 205 and, therefore, denies the allegations.

Answer to Paragraph 206: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 206 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 206 and, therefore, denies the allegations.

Answer to Paragraph 207: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 207 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 207 and, therefore, denies the allegations.

Answer to Paragraph 208: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 208 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 208 and, therefore, denies the allegations.

Answer to Paragraph 209: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 209 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 209 and, therefore, denies the allegations.

Answer to Paragraph 210: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 210 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 210 and, therefore, denies the allegations.

Answer to Paragraph 211: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 211 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 211 and, therefore, denies the allegations.

Answer to Paragraph 212: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 212 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 212 and, therefore, denies the allegations.

Answer to Paragraph 213: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 213 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 213 and, therefore, denies the allegations.

Answer to Paragraph 214: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 214 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 214 and, therefore, denies the allegations.

Answer to Paragraph 215: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 215 premised on any such conspiracy.

Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 215 and, therefore, denies the allegations.

Answer to Paragraph 216: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 216 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 216 and, therefore, denies the allegations.

Answer to Paragraph 217: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 217 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 217 and, therefore, denies the allegations.

Answer to Paragraph 218: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 218 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 218 and, therefore, denies the allegations.

Answer to Paragraph 219: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 219 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 219 and, therefore, denies the allegations.

Answer to Paragraph 220: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 220 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 220 and, therefore, denies the allegations.

Answer to Paragraph 221: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 221 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 221 and, therefore, denies the allegations.

Answer to Paragraph 222: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 222 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 222 and, therefore, denies the allegations.

Answer to Paragraph 223: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 223 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 223 and, therefore, denies the allegations.

Answer to Paragraph 224: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 224 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 224 and, therefore, denies the allegations.

Answer to Paragraph 225: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 225 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 225 and, therefore, denies the allegations.

Answer to Paragraph 226: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 226 premised on any such conspiracy.

Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 226 and, therefore, denies the allegations.

Answer to Paragraph 227: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 227 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 227 and, therefore, denies the allegations.

Answer to Paragraph 228: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 228 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 228 and, therefore, denies the allegations.

Answer to Paragraph 229: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 229 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 229 and, therefore, denies the allegations.

Answer to Paragraph 230: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 230 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 230 and, therefore, denies the allegations.

Answer to Paragraph 231: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 231 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 231 and, therefore, denies the allegations.

Answer to Paragraph 232: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 232 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 232 and, therefore, denies the allegations.

Answer to Paragraph 233: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 233 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 233 and, therefore, denies the allegations.

Answer to Paragraph 234: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and, therefore, denies the allegations.

Answer to Paragraph 235: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and, therefore, denies the allegations.

Answer to Paragraph 236: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236 and, therefore, denies the allegations.

Answer to Paragraph 237: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237 and, therefore, denies the allegations.

Answer to Paragraph 238: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and, therefore, denies the allegations.

Answer to Paragraph 239: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239 and, therefore, denies the allegations.

Answer to Paragraph 240: Seaboard admits that it is a limited-liability company headquartered in the area of Johnson County, Kansas, designated as Shawnee Mission, Kansas; that it is a wholly owned subsidiary of Seaboard Corporation; and that it sold pork in interstate commerce during the Class Period. Seaboard denies the remaining allegations of Paragraph 240.

Answer to Paragraph 241: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241 and, therefore, denies the allegations.

Answer to Paragraph 242: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242 and, therefore, denies the allegations.

Answer to Paragraph 243: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243 and, therefore, denies the allegations.

Answer to Paragraph 244: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and, therefore, denies the allegations.

Answer to Paragraph 245: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245 and, therefore, denies the allegations.

Answer to Paragraph 246: Seaboard admits that Plaintiffs purport to bring this action on behalf of classes as defined in Paragraph 246. Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 246 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 247: Paragraph 247 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise.

Answer to Paragraph 248: Paragraph 248 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 248 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 249: Paragraph 249 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 249 contains factual allegations, Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

Answer to Paragraph 250: Paragraph 250 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 250 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 251: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 251 premised on any such conspiracy. Paragraph 251 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 251 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 252: Paragraph 252 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 252 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 253: Paragraph 253 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 253 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 254: Paragraph 254 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 254 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 255: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 255 premised on any such conspiracy. Paragraph 255 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise. To the extent that Paragraph 255 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 256: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 256 premised on any such conspiracy. Paragraph 256 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on

behalf of the purported classes or otherwise. To the extent that Paragraph 256 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 257: Seaboard denies the allegations in Paragraph 257 and its subparts.

Answer to Paragraph 258: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258 and, therefore, denies the allegations.

Answer to Paragraph 259: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259 and, therefore, denies the allegations.

Answer to Paragraph 260: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 260 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 260 and, therefore, denies the allegations.

Answer to Paragraph 261: Seaboard denies the conspiracy or conspiracies alleged in the Complaint and any allegations in Paragraph 261 premised on any such conspiracy. Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 261 and, therefore, denies the allegations.

Answer to Paragraph 262: Seaboard denies the allegations in Paragraph 262.

Answer to Paragraph 263: Seaboard denies the allegations in Paragraph 263.

Answer to Paragraph 264: Seaboard denies the allegations in Paragraph 264.

Answer to Paragraph 265: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 266: Seaboard denies the allegations in Paragraph 266.

Answer to Paragraph 267: Seaboard denies the allegations in Paragraph 267 and its subparts.

Answer to Paragraph 268: Seaboard denies the allegations in Paragraph 268.

Answer to Paragraph 269: Seaboard denies the allegations in Paragraph 269.

Answer to Paragraph 270: Seaboard denies the allegations in Paragraph 270.

Answer to Paragraph 271: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 272: Seaboard admits that it submits information to Agri Stats and receives Agri Stats reports, but denies any characterization of those reports contained in Paragraph in 272, and denies the remaining allegations in Paragraph 272.

Answer to Paragraph 273: Paragraph 273 sets forth a legal conclusion to which no response is required. To the extent a response is required, Seaboard denies the allegations in Paragraph 273.

Answer to Paragraph 274: Paragraph 274 sets forth legal conclusions to which no response is required. To the extent a response is required, Seaboard denies the allegations in Paragraph 274.

Answer to Paragraph 275: Paragraph 275 sets forth a legal conclusion to which no response is required. To the extent a response is required, Seaboard denies the allegations in Paragraph 275.

Answer to Paragraph 276: Seaboard lacks information or knowledge to answer as to how other Defendants “view” pork products, and, therefore, denies the allegations as to other Defendants. Seaboard denies the remaining allegations in Paragraph 276.

Answer to Paragraph 277: Seaboard denies the allegations in Paragraph 277.

Answer to Paragraph 278: Seaboard denies the allegations in Paragraph 278.

Answer to Paragraph 279: Seaboard denies the allegations in Paragraph 279.

Answer to Paragraph 280: Seaboard denies the allegations in Paragraph 280.

Answer to Paragraph 281: Seaboard denies the allegations in Paragraph 281.

Answer to Paragraph 282: Seaboard denies the allegations in Paragraph 282.

Answer to Paragraph 283: Seaboard denies the allegations in Paragraph 283.

Answer to Paragraph 284: Seaboard denies the allegations in Paragraph 284.

Answer to Paragraph 285: Seaboard incorporates by reference the responses in the preceding paragraphs.

Answer to Paragraph 286: Paragraph 286 contains Plaintiffs’ characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies that this action can be properly maintained as a class action whether on behalf of the purported classes or otherwise.

Answer to Paragraph 287: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 288: Seaboard denies the allegations in Paragraph 288.

Answer to Paragraph 289: Seaboard denies the allegations in Paragraph 289.

Answer to Paragraph 290: Seaboard denies the allegations in Paragraph 290.

Answer to Paragraph 291: Seaboard denies the allegations in Paragraph 291.

Answer to Paragraph 292: Seaboard denies the allegations in Paragraph 292.

Answer to Paragraph 293: Seaboard denies the allegations in Paragraph 293.

Answer to Paragraph 294: Seaboard denies the allegations in Paragraph 294.

Answer to Paragraph 295: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 296: Paragraph 296 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 297: Paragraph 297 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 298: Paragraph 298 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 299: Paragraph 299 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 300: Seaboard denies the allegations in Paragraph 300.

Answer to Paragraph 301: Seaboard denies the allegations in Paragraph 301.

Answer to Paragraph 302: Seaboard denies the allegations in Paragraph 302.

Answer to Paragraph 303: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 304: Paragraph 304 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 305: Seaboard denies the allegations in Paragraph 305.

Answer to Paragraph 306: Paragraph 306 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 307: Seaboard denies the allegations in Paragraph 307.

Answer to Paragraph 308: Seaboard denies the allegations in Paragraph 308.

Answer to Paragraph 309: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 310: Paragraph 310 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 311: Seaboard denies the allegations in Paragraph 311.

Answer to Paragraph 312: Paragraph 312 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 313: Seaboard denies the allegations in Paragraph 313.

Answer to Paragraph 314: Seaboard denies the allegations in Paragraph 314.

Answer to Paragraph 315: Seaboard denies the allegations in Paragraph 315.

Answer to Paragraph 316: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 317: Paragraph 317 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 318: Seaboard denies the allegations in Paragraph 318.

Answer to Paragraph 319: Seaboard denies the allegations in Paragraph 319.

Answer to Paragraph 320: Seaboard denies the allegations in Paragraph 320.

Answer to Paragraph 321: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 322: Paragraph 322 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 323: Seaboard denies the allegations in Paragraph 323.

Answer to Paragraph 324: Paragraph 324 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 325: Seaboard denies the allegations in Paragraph 325.

Answer to Paragraph 326: Seaboard denies the allegations in Paragraph 326.

Answer to Paragraph 327: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 328: Paragraph 328 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 329: Seaboard denies the allegations in Paragraph 329.

Answer to Paragraph 330: Paragraph 330 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 331: Seaboard denies the allegations in Paragraph 331.

Answer to Paragraph 332: Seaboard denies the allegations in Paragraph 332.

Answer to Paragraph 333: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 334: Paragraph 334 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 335: Seaboard denies the allegations in Paragraph 335.

Answer to Paragraph 336: Paragraph 336 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 337: Seaboard denies the allegations in Paragraph 337.

Answer to Paragraph 338: Seaboard denies the allegations in Paragraph 338.

Answer to Paragraph 339: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 340: Paragraph 340 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 341: Seaboard denies the allegations in Paragraph 341.

Answer to Paragraph 342: Paragraph 342 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 343: Seaboard denies the allegations in Paragraph 343.

Answer to Paragraph 344: Seaboard denies the allegations in Paragraph 344.

Answer to Paragraph 345: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 346: Paragraph 346 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 347: Paragraph 347 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 348: Seaboard denies the allegations in Paragraph 348.

Answer to Paragraph 349: Paragraph 349 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 350: Seaboard denies the allegations in Paragraph 350.

Answer to Paragraph 351: Seaboard denies the allegations in Paragraph 351.

Answer to Paragraph 352: Seaboard denies the allegations in Paragraph 352.

Answer to Paragraph 353: Seaboard denies the allegations in Paragraph 353.

Answer to Paragraph 354: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 355: Paragraph 355 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 356: Seaboard denies the allegations in Paragraph 356.

Answer to Paragraph 357: Paragraph 357 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 358: Seaboard denies the allegations in Paragraph 358.

Answer to Paragraph 359: Seaboard denies the allegations in Paragraph 359.

Answer to Paragraph 360: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 361: Paragraph 361 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 362: Seaboard denies the allegations in Paragraph 362.

Answer to Paragraph 363: Paragraph 363 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 364: Seaboard denies the allegations in Paragraph 364.

Answer to Paragraph 365: Seaboard denies the allegations in Paragraph 365.

Answer to Paragraph 366: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 367: Paragraph 367 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 368: Paragraph 368 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 369: Seaboard denies the allegations in Paragraph 369.

Answer to Paragraph 370: Paragraph 370 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 371: Seaboard denies the allegations in Paragraph 371.

Answer to Paragraph 372: Seaboard denies the allegations in Paragraph 372.

Answer to Paragraph 373: Seaboard denies the allegations in Paragraph 373.

Answer to Paragraph 374: Seaboard lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374 and, therefore, denies the allegations.

Answer to Paragraph 375: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 376: Paragraph 376 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 377: Seaboard denies the allegations in Paragraph 377.

Answer to Paragraph 378: Paragraph 378 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 379: Seaboard denies the allegations in Paragraph 379.

Answer to Paragraph 380: Seaboard denies the allegations in Paragraph 380.

Answer to Paragraph 381: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 382: Paragraph 382 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 383: Seaboard denies the allegations in Paragraph 383.

Answer to Paragraph 384: Paragraph 384 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 385: Seaboard denies the allegations in Paragraph 385.

Answer to Paragraph 386: Seaboard denies the allegations in Paragraph 386.

Answer to Paragraph 387: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 388: Paragraph 388 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 389: Seaboard denies the allegations in Paragraph 389.

Answer to Paragraph 390: Paragraph 390 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 391: Seaboard denies the allegations in Paragraph 391.

Answer to Paragraph 392: Seaboard denies the allegations in Paragraph 392.

Answer to Paragraph 393: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 394: Seaboard denies the allegations in Paragraph 394.

Answer to Paragraph 395: Seaboard denies the allegations in Paragraph 395.

Answer to Paragraph 396: Seaboard denies the allegations in Paragraph 396.

Answer to Paragraph 397: Seaboard denies the allegations in Paragraph 397.

Answer to Paragraph 398: Seaboard denies the allegations in Paragraph 398.

Answer to Paragraph 399: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 400: Paragraph 400 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 401: Seaboard denies the allegations in Paragraph 401.

Answer to Paragraph 402: Paragraph 402 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 403: Seaboard denies the allegations in Paragraph 403.

Answer to Paragraph 404: Seaboard denies the allegations in Paragraph 404.

Answer to Paragraph 405: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 406: Paragraph 406 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 407: Seaboard denies the allegations in Paragraph 407.

Answer to Paragraph 408: Paragraph 408 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 409: Seaboard denies the allegations in Paragraph 409.

Answer to Paragraph 410: Seaboard denies the allegations in Paragraph 410.

Answer to Paragraph 411: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 412: Paragraph 412 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 413: Seaboard denies the allegations in Paragraph 413.

Answer to Paragraph 414: Seaboard denies the allegations in Paragraph 414

Answer to Paragraph 415: Seaboard denies the allegations in Paragraph 415.

Answer to Paragraph 416: Seaboard denies the allegations in Paragraph 416.

Answer to Paragraph 417: Paragraph 417 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 418: Seaboard denies the allegations in Paragraph 418.

Answer to Paragraph 419: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 420: Paragraph 420 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 421: Seaboard denies the allegations in Paragraph 421.

Answer to Paragraph 422: Paragraph 422 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 423: Seaboard denies the allegations in Paragraph 423.

Answer to Paragraph 424: Seaboard denies the allegations in Paragraph 424.

Answer to Paragraph 425: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 426: Seaboard denies the allegations in Paragraph 426.

Answer to Paragraph 427: Seaboard denies the allegations in Paragraph 427.

Answer to Paragraph 428: Seaboard denies the allegations in Paragraph 428.

Answer to Paragraph 429: Seaboard denies the allegations in Paragraph 429.

Answer to Paragraph 430: Seaboard incorporates by reference the responses in the preceding paragraphs.

Answer to Paragraph 431: Paragraph 431 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 432: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 433: Seaboard denies the allegations in Paragraph 433.

Answer to Paragraph 434: Seaboard denies the allegations in Paragraph 434.

Answer to Paragraph 435: Paragraph 435 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 436: Seaboard denies the allegations in Paragraph 436.

Answer to Paragraph 437: Seaboard denies the allegations in Paragraph 437.

Answer to Paragraph 438: Seaboard denies the allegations in Paragraph 438.

Answer to Paragraph 439: Seaboard denies the allegations in Paragraph 439.

Answer to Paragraph 440: Seaboard denies the allegations in Paragraph 440.

Answer to Paragraph 441: Seaboard denies the allegations in Paragraph 441.

Answer to Paragraph 442: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 443: Paragraph 443 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 443 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 444: Seaboard denies the allegations in Paragraph 444.

Answer to Paragraph 445: Paragraph 445 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 445 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 446: Seaboard denies the allegations in Paragraph 446.

Answer to Paragraph 447: Seaboard denies the allegations in Paragraph 447.

Answer to Paragraph 448: Seaboard denies the allegations in Paragraph 448.

Answer to Paragraph 449: Seaboard denies the allegations in Paragraph 449.

Answer to Paragraph 450: Seaboard denies the allegations in Paragraph 450.

Answer to Paragraph 451: Seaboard denies the allegations in Paragraph 451.

Answer to Paragraph 452: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 453: Paragraph 453 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 454: Paragraph 454 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 455: Paragraph 455 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 456: Paragraph 456 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 457: Seaboard denies the allegations in Paragraph 457.

Answer to Paragraph 458: Seaboard denies the allegations in Paragraph 458.

Answer to Paragraph 459: Seaboard denies the allegations in Paragraph 459.

Answer to Paragraph 460: Seaboard denies the allegations in Paragraph 460.

Answer to Paragraph 461: Seaboard denies the allegations in Paragraph 461.

Answer to Paragraph 462: Seaboard denies the allegations in Paragraph 462.

Answer to Paragraph 463: Seaboard denies the allegations in Paragraph 463.

Answer to Paragraph 464: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 465: Seaboard denies the allegations in Paragraph 465.

Answer to Paragraph 466: Seaboard denies the allegations in Paragraph 466.

Answer to Paragraph 467: Seaboard denies the allegations in Paragraph 467.

Answer to Paragraph 468: Seaboard denies the allegations in Paragraph 468.

Answer to Paragraph 469: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 470: Seaboard denies the allegations in Paragraph 470.

Answer to Paragraph 471: Seaboard denies the allegations in Paragraph 471.

Answer to Paragraph 472: Seaboard denies the allegations in Paragraph 472.

Answer to Paragraph 473: Seaboard denies the allegations in Paragraph 473.

Answer to Paragraph 474: Seaboard denies the allegations in Paragraph 474.

Answer to Paragraph 475: Seaboard denies the allegations in Paragraph 475.

Answer to Paragraph 476: Seaboard denies the allegations in Paragraph 476.

Answer to Paragraph 477: Seaboard denies the allegations in Paragraph 477.

Answer to Paragraph 478: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 479: Paragraph 479 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To

the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions.

Answer to Paragraph 480: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 481: Seaboard denies the allegations in Paragraph 481.

Answer to Paragraph 482: Seaboard denies the allegations in Paragraph 482.

Answer to Paragraph 483: Seaboard denies the allegations in Paragraph 483.

Answer to Paragraph 484: Seaboard denies the allegations in Paragraph 484.

Answer to Paragraph 485: Seaboard denies the allegations in Paragraph 485.

Answer to Paragraph 486: Seaboard denies the allegations in Paragraph 486.

Answer to Paragraph 487: Seaboard denies the allegations in Paragraph 487.

Answer to Paragraph 488: Seaboard denies the allegations in Paragraph 488.

Answer to Paragraph 489: Seaboard denies the allegations in Paragraph 489.

Answer to Paragraph 490: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 491: Seaboard denies the allegations in Paragraph 491.

Answer to Paragraph 492: Seaboard denies the allegations in Paragraph 492.

Answer to Paragraph 493: Seaboard denies the allegations in Paragraph 493.

Answer to Paragraph 494: Seaboard denies the allegations in Paragraph 494.

Answer to Paragraph 495: Seaboard denies the allegations in Paragraph 495.

Answer to Paragraph 496: Seaboard denies the allegations in Paragraph 496.

Answer to Paragraph 497: Seaboard denies the allegations in Paragraph 497.

Answer to Paragraph 498: Seaboard denies the allegations in Paragraph 498.

Answer to Paragraph 499: Seaboard denies the allegations in Paragraph 499.

Answer to Paragraph 500: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 501: Seaboard denies the allegations in Paragraph 501.

Answer to Paragraph 502: Seaboard denies the allegations in Paragraph 502.

Answer to Paragraph 503: Seaboard denies the allegations in Paragraph 503.

Answer to Paragraph 504: Seaboard denies the allegations in Paragraph 504.

Answer to Paragraph 505: Seaboard denies the allegations in Paragraph 505.

Answer to Paragraph 506: Seaboard denies the allegations in Paragraph 506.

Answer to Paragraph 507: Seaboard denies the allegations in Paragraph 507.

Answer to Paragraph 508: Seaboard denies the allegations in Paragraph 508.

Answer to Paragraph 509: Seaboard denies the allegations in Paragraph 509.

Answer to Paragraph 510: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 511: Seaboard denies the allegations in Paragraph 511.

Answer to Paragraph 512: Seaboard denies the allegations in Paragraph 512.

Answer to Paragraph 513: Seaboard denies the allegations in Paragraph 513.

Answer to Paragraph 514: Seaboard denies the allegations in Paragraph 514.

Answer to Paragraph 515: Seaboard denies the allegations in Paragraph 515.

Answer to Paragraph 516: Seaboard denies the allegations in Paragraph 516.

Answer to Paragraph 517: Seaboard denies the allegations in Paragraph 517.

Answer to Paragraph 518: Seaboard denies the allegations in Paragraph 518.

Answer to Paragraph 519: Seaboard denies the allegations in Paragraph 519.

Answer to Paragraph 520: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 521: Seaboard denies the allegations in Paragraph 521.

Answer to Paragraph 522: Seaboard denies the allegations in Paragraph 522.

Answer to Paragraph 523: Seaboard denies the allegations in Paragraph 523.

Answer to Paragraph 524: Seaboard denies the allegations in Paragraph 524.

Answer to Paragraph 525: Seaboard denies the allegations in Paragraph 525.

Answer to Paragraph 526: Seaboard denies the allegations in Paragraph 526.

Answer to Paragraph 527: Seaboard denies the allegations in Paragraph 527.

Answer to Paragraph 528: Seaboard denies the allegations in Paragraph 528.

Answer to Paragraph 529: Seaboard denies the allegations in Paragraph 529.

Answer to Paragraph 530: Seaboard denies the allegations in Paragraph 530.

Answer to Paragraph 531: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 532: Seaboard denies the allegations in Paragraph 532.

Answer to Paragraph 533: Seaboard denies the allegations in Paragraph 533.

Answer to Paragraph 534: Seaboard denies the allegations in Paragraph 534.

Answer to Paragraph 535: Seaboard denies the allegations in Paragraph 535.

Answer to Paragraph 536: Seaboard denies the allegations in Paragraph 536.

Answer to Paragraph 537: Seaboard denies the allegations in Paragraph 537.

Answer to Paragraph 538: Seaboard denies the allegations in Paragraph 538.

Answer to Paragraph 539: Seaboard denies the allegations in Paragraph 539.

Answer to Paragraph 540: Seaboard denies the allegations in Paragraph 540.

Answer to Paragraph 541: Seaboard denies the allegations in Paragraph 541.

Answer to Paragraph 542: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 543: Seaboard denies the allegations in Paragraph 543.

Answer to Paragraph 544: Seaboard denies the allegations in Paragraph 544.

Answer to Paragraph 545: Seaboard denies the allegations in Paragraph 545.

Answer to Paragraph 546: Seaboard denies the allegations in Paragraph 546.

Answer to Paragraph 547: Seaboard denies the allegations in Paragraph 547.

Answer to Paragraph 548: Seaboard denies the allegations in Paragraph 548.

Answer to Paragraph 549: Seaboard denies the allegations in Paragraph 549.

Answer to Paragraph 550: Seaboard denies the allegations in Paragraph 550.

Answer to Paragraph 551: Seaboard denies the allegations in Paragraph 551.

Answer to Paragraph 552: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 553: Seaboard denies the allegations in Paragraph 553.

Answer to Paragraph 554: Seaboard denies the allegations in Paragraph 554.

Answer to Paragraph 555: Seaboard denies the allegations in Paragraph 555.

Answer to Paragraph 556: Seaboard denies the allegations in Paragraph 556.

Answer to Paragraph 557: Seaboard denies the allegations in Paragraph 557.

Answer to Paragraph 558: Seaboard denies the allegations in Paragraph 558.

Answer to Paragraph 559: Seaboard denies the allegations in Paragraph 559.

Answer to Paragraph 560: Seaboard denies the allegations in Paragraph 560.

Answer to Paragraph 561: Seaboard denies the allegations in Paragraph 561.

Answer to Paragraph 562: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 563: Seaboard denies the allegations in Paragraph 563.

Answer to Paragraph 564: Seaboard denies the allegations in Paragraph 564.

Answer to Paragraph 565: Seaboard denies the allegations in Paragraph 565.

Answer to Paragraph 566: Seaboard denies the allegations in Paragraph 566.

Answer to Paragraph 567: Seaboard denies the allegations in Paragraph 567.

Answer to Paragraph 568: Seaboard denies the allegations in Paragraph 568.

Answer to Paragraph 569: Seaboard denies the allegations in Paragraph 569.

Answer to Paragraph 570: Seaboard denies the allegations in Paragraph 570.

Answer to Paragraph 571: Seaboard denies the allegations in Paragraph 571.

Answer to Paragraph 572: Paragraph 572 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 572 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 573: Seaboard denies the allegations in Paragraph 573.

Answer to Paragraph 574: Seaboard denies the allegations in Paragraph 574.

Answer to Paragraph 575: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 576: Seaboard denies the allegations in Paragraph 576.

Answer to Paragraph 577: Seaboard denies the allegations in Paragraph 577.

Answer to Paragraph 578: Seaboard denies the allegations in Paragraph 578.

Answer to Paragraph 579: Seaboard denies the allegations in Paragraph 579.

Answer to Paragraph 580: Seaboard denies the allegations in Paragraph 580.

Answer to Paragraph 581: Seaboard denies the allegations in Paragraph 581.

Answer to Paragraph 582: Seaboard denies the allegations in Paragraph 582.

Answer to Paragraph 583: Seaboard denies the allegations in Paragraph 583.

Answer to Paragraph 584: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 585: Seaboard denies the allegations in Paragraph 585.

Answer to Paragraph 586: Seaboard denies the allegations in Paragraph 586.

Answer to Paragraph 587: Paragraph 587 contains Plaintiffs' characterization of their claims and/or legal argument and conclusions, to which no response is required. To the extent a response is required, Seaboard denies the characterizations, arguments, and conclusions. To the extent that Paragraph 587 contains factual allegations, Seaboard denies the allegations.

Answer to Paragraph 588: Seaboard denies the allegations in Paragraph 588.

Answer to Paragraph 589: Seaboard denies the allegations in Paragraph 589.

Answer to Paragraph 590: Seaboard denies the allegations in Paragraph 590.

Answer to Paragraph 591: Seaboard denies the allegations in Paragraph 591.

Answer to Paragraph 592: Seaboard denies the allegations in Paragraph 592.

Answer to Paragraph 593: Seaboard denies the allegations in Paragraph 593.

Answer to Paragraph 594: Seaboard denies the allegations in Paragraph 594.

Answer to Paragraph 595: Seaboard denies the allegations in Paragraph 595.

Answer to Paragraph 596: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 597: Seaboard denies the allegations in Paragraph 597.

Answer to Paragraph 598: Seaboard denies the allegations in Paragraph 598.

Answer to Paragraph 599: Seaboard denies the allegations in Paragraph 599.

Answer to Paragraph 600: Seaboard denies the allegations in Paragraph 600.

Answer to Paragraph 601: Seaboard denies the allegations in Paragraph 601.

Answer to Paragraph 602: Seaboard denies the allegations in Paragraph 602.

Answer to Paragraph 603: Seaboard denies the allegations in Paragraph 603.

Answer to Paragraph 604: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 605: Seaboard denies the allegations in Paragraph 605.

Answer to Paragraph 606: Seaboard denies the allegations in Paragraph 606.

Answer to Paragraph 607: Seaboard denies the allegations in Paragraph 607.

Answer to Paragraph 608: Seaboard denies the allegations in Paragraph 608.

Answer to Paragraph 609: Seaboard denies the allegations in Paragraph 609.

Answer to Paragraph 610: Seaboard denies the allegations in Paragraph 610.

Answer to Paragraph 611: Seaboard denies the allegations in Paragraph 611.

Answer to Paragraph 612: Seaboard incorporates and restates, as though fully set forth herein, each and every response set forth in the preceding paragraphs of this Answer.

Answer to Paragraph 613: Seaboard denies the allegations in Paragraph 613.

Answer to Paragraph 614: Seaboard denies the allegations in Paragraph 614.

Answer to Paragraph 615: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 616: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 617: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which

Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 618: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 619: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 620: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for

Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 621: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 622: The Request for Relief and its subparts contains no factual assertions to which a response is required. The Request for Relief and its subparts further states legal conclusions and Plaintiffs' characterizations of this action, with which Seaboard disagrees and to which no response is required. To the extent the Request for Relief and its subparts may be deemed to require a response, it is denied. Seaboard denies that Plaintiffs are entitled to any of the relief requested in the Request for Relief and its subparts.

Answer to Paragraph 623: The Jury Demand does not contain any factual assertions to which a response is required. To the extent the Jury Demand is deemed to require a response, Seaboard also demands a jury trial as set forth below.

AFFIRMATIVE DEFENSES

Seaboard does not concede that it has the burden of proof on any defense set forth below. Seaboard reserves the right to assert any additional affirmative or avoidance defenses as may become applicable and apparent during the course of this action.

FIRST DEFENSE

Plaintiffs fail, in whole or in part, to state a claim upon which relief may be granted.

SECOND DEFENSE

Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages were not legally or proximately caused by any acts or omissions of Defendants and/or were caused, if at all, solely and proximately by the conduct of Plaintiffs themselves or third parties including, without limitations, the prior, intervening or superseding conduct of such Plaintiffs or third parties.

THIRD DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, because Plaintiffs failed to mitigate any damages they may have suffered.

FOURTH DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, by the doctrine of waiver.

FIFTH DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, by the doctrine of estoppel.

SIXTH DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, by the doctrine of laches.

SEVENTH DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, by the applicable statute of limitations.

EIGHTH DEFENSE

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, due to the ratification of, and consent to, the conduct of Seaboard.

NINTH DEFENSE

Without admitting the existence of any contract, combination or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

TENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution.

ELEVENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Seaboard's conduct did not cause harm to competition in any relevant market.

TWELFTH DEFENSE

To the extent Plaintiffs claim that Seaboard fraudulently concealed any actions, Plaintiffs have failed to allege this fraud with the particularity required by Federal Rule of Civil Procedure 9(b).

THIRTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because any alleged anti-competitive effects of the conduct alleged by Plaintiffs do not outweigh the pro-competitive benefits.

FOURTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because of the *Copperweld* doctrine.

FIFTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Seaboard acted unilaterally, in furtherance of its independent business interests.

SIXTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because any contracts or agreements between Seaboard and any other person were lawful business arrangements and cannot support a claim that Seaboard engaged in any unlawful conspiracy.

SEVENTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because they did not suffer antitrust injury or injury-in-fact.

EIGHTEENTH DEFENSE

Plaintiffs' damages claims are barred, in whole or in part, because they have suffered no damages or because the damages they seek are speculative and uncertain.

NINETEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, by the doctrines of *in pari delicto*, involvement, participation, equal involvement, complete involvement, and unclean hands.

TWENTIETH DEFENSE

Seaboard adopts by reference any applicable defense pleaded by any other Defendant that is not otherwise expressly set forth in this Answer.

TWENTY-FIRST DEFENSE

Seaboard reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

PRAYER FOR RELIEF

WHEREFORE, Seaboard respectfully requests that judgment be entered in favor of Seaboard and the other Defendants and against Plaintiff, dismissing the Complaint in its entirety with prejudice. Seaboard further requests that this Court: (i) award Seaboard its costs and disbursements; and (ii) award such other and further relief as the Court deems just and proper.

JURY TRIAL DEMANDED

Pursuant to the Federal Rules of Civil Procedure 38, Seaboard demands a trial by jury on all claims so triable.

Dated: December 16, 2020

/s/ Peter J. Schwingler

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